

SOUTHERN ENVIRONMENTAL LAW CENTER

Telephone 843-720-5270

525 EAST BAY STREET, SUITE 200
CHARLESTON, SC 29403-6655

Facsimile 843-414-7039

May 18, 2021

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

In Re: Dominion Energy South Carolina, Incorporated's 2021 Avoided Cost Proceeding
Pursuant to S.C. Code Ann. Section 58-41-20(A) (Docket No. 2021-88-E)

Dear Ms. Boyd,

South Carolina Coastal Conservation League ("CCL") and Southern Alliance for Clean Energy ("SACE"), as anticipated intervenors in this proceeding, submit this letter in support of the South Carolina Department of Consumer Affairs ("DCA") Motion for the Public Service Commission ("Commission") to Review the Sufficiency of Dominion Energy South Carolina, Incorporated's ("DESC") Application in Docket No. 2021-88-E.

Act 62 requires "[e]ach electrical utility's avoided cost filing [to] be reasonably transparent so that underlying assumptions, data, and results can be independently reviewed and verified by the parties and the commission." S.C. Code Ann. § 58-41-20(J). However, DESC's incomplete application and proposal to submit key information with its direct testimony, due on June 29, 2021—just two weeks before intervenors' direct testimony is due—will deprive the parties and the Commission's third-party consultant of conducting any meaningful review of DESC's avoided cost application, in direct contravention of Act 62.

For this reason, and the additional reasons set out in DCA's Motion, we respectfully urge the Commission to find DESC's application deficient and to require DESC to file a complete application on or before June 1, 2021.

Sincerely,

s/Kate Mixson
Southern Environmental Law Center
525 East Bay Street, Suite 200
Charleston, South Carolina 29403
Telephone: (843) 720-5270
Facsimile: (843) 414-7039
kmixson@selcsc.org

*Counsel for Anticipated Intervenors South Carolina
Coastal Conservation League and Southern Alliance
for Clean Energy*

cc: All Counsel of Record